

Judge Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,)	Case No: CR14-5394RJB
)	
Plaintiff,)	MOTION TO CONTINUE TRIAL
)	
vs.)	
)	
JESUS ENRIQUE PALOMERA,)	
)	
Defendant.)	

COMES NOW, the Defendant JESUS ENRIQUE PALOMERA, by and through his attorney, Thomas E. Weaver, and moves to continue the trial date. This motion is supported by the attached Declaration of Thomas E. Weaver and Waiver of Speedy Trial.

DATED this 15th day of July, 2016.

/s/ _____
Thomas E. Weaver WSBA # 22488
Attorney for the Defendant

MOTION TO CONTINUE TRIAL

The Law Office of Thomas E. Weaver
P.O. Box 1056
Bremerton WA 98337
(360) 792-9345

1
2 STATE OF WASHINGTON :

3 : cc
4 COUNTY OF KITSAP :

I, THOMAS E. WEAVER, hereby declare under penalty of perjury that:

5 I am the attorney for Jesus Enrique Palomera. Trial is scheduled for
6 August 22, 2016. Mr. Palomera is currently charged by Superseding Indictment
7 with 17 felony counts. The most serious charge is Continuing Criminal
8 Enterprise, which carries a mandatory minimum of 20 years in prison. To date I
9 have received no discovery, but a review of the charges indicate Mr. Palomera has
10 been investigated by the DEA since at least 2011 and in at least three states
11 (Oregon, California, and Washington). Mr. Palomera was arrested in Mexico and
12 extradited to the United States. The Government states the discovery is very
13 voluminous.

14 Given the seriousness of the charges and the quantum of anticipated
15 discovery, additional time to prepare for trial is necessary. On July 14, 2016 I
16 spoke with Mr. Palomera and he agreed to waive his right to a speedy trial
17 through January 31, 2017. (With apologies to the court, I did not have a
18 preprinted speedy trial waiver and prepared a handwritten one.) It is requested
19 that the court continue the trial date to December or January.

20 DATED this 15th day of July, 2016.
21
22
23

24 /s/
Thomas E. Weaver WSBA # 22488
25 Attorney for the Defendant

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CERTIFICATE OF SERVICE

I certify that on July 15, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record.

DATED this 15th day of July, 2016.

/s/
Thomas E. Weaver WSBA # 22488
Attorney for the Petitioner

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